

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

TRAVIS S. BREEDEN,

Plaintiff,

v.

COLLECTION PROFESSIONALS, INC. and  
APLINGTON, KAUFMAN, MCCLINTOCK,  
STEELE AND BARRY, LTD.,

Defendants.

1:19-cv-08416

Honorable Robert M. Dow, Jr.

**JOINT INITIAL STATUS REPORT**

Pursuant to Fed. R. Civ. P. 26(f) and this Court's Case Management Procedures, TRAVIS S. BREEDEN ("Plaintiff") and COLLECTION PROFESSIONALS, INC. and APLINGTON, KAUFMAN, MCCLINTOCK, STEELE AND BARRY, LTD. ("Defendants"), hereby submit this Joint Initial Status Report.

**1. Nature of the Case**

**A. Parties:**

For Plaintiff, Travis S. Breedon

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**Eric Donald Coleman**  
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For Defendants

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**B. Jurisdiction:** Federal question jurisdiction is based on the Fair Debt Collection Practices Act (“FDCPA”), 15 U.S.C. §1692 *et seq.*

**C. Claims asserted:** Plaintiff brings his Complaint against Defendants for alleged violations of the FDCPA. Plaintiff alleges that Defendant made false, unfair, and misleading representations to him during its debt collection activity.

**D. Service:** Defendants have been served and are represented by counsel.

**E. Legal Issue:** Were the representations made by Defendants to Plaintiff false, unfair, and misleading under the FDCPA? Was the debt consumer debt under the FDCPA? Can the Defendants establish an affirmative defense?

**F. Factual Issues:** What statements did Defendants make to Plaintiff?

**G. Jury Demand:** Plaintiff has demanded a jury trial.

**H. Proposed Discovery:**

i. The Parties anticipate both written and oral discovery. At this point no discovery has been exchanged.

ii. This matter is subject to the Mandatory Initial Discovery Pilot (“MIDP”) program. The Parties will comply with the disclosures and timing outlined by the MIDP program. MIDP disclosures are currently due April 9, 2020.

iii. The Parties to issue written discovery by April 28, 2020.

iv. Fact discovery to be completed by October 28, 2020.

v. Expert discovery to be completed by October 28, 2020.

**I. Trial:** The Parties should be ready to proceed to trial by February 2021 and do not anticipate any trial lasting more than two days.

**J. Magistrate Judge:** The Parties do not unanimously consent to proceed before a Magistrate Judge.

**K. Settlement:** Plaintiff has recently tendered a settlement demand to Defendants and is awaiting a response to the same.

**J. Settlement Conference:** Plaintiff is open to participate in a settlement conference once written discovery is exchanged.

Dated: February 3, 2020

s/ Nathan Charles Volheim  
Nathan C. Volheim  
*Counsel for Plaintiff*

/s/Louis J. Manetti, Jr.  
Louis J. Manetti, Jr.  
Counsel for Defendants